



August 29, 2011

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Notice, Docket No. PS 06-229

Dear Ms. Dortch:

Huawei Technologies (USA) (“Huawei”) submits this ex parte communication in the above referenced proceeding to express support for the views of Harris Corporation (“Harris”) and others on the benefits of a competitive market for applications, network technologies, and devices to serve public safety wireless broadband communications. As stated in a letter to members of Congress made part of the August 1, 2011 Harris filing with the Federal Communications Commission (FCC), Huawei endorses the principle that public safety should “be able to choose from competing vendors in procuring numerous technologies that will comprise the public safety broadband wireless network using open standards.”¹

The impending tenth anniversary of the terrorist attacks on the United States offers a solemn reminder of the extraordinary risks taken each day by public safety workers in communities throughout the country. In order to protect and attend to the lives and property of our citizens—and to each others’ lives—our first responders should be equipped with tools that enable them to most effectively perform their mission critical and life saving operations. The rapid innovations in wireless technologies made possible by open standards and a competitive market, both in terms of the quality and pricing of services and devices, are the hallmark of the commercial mobile services market; these innovations should also insure to the benefit of those who heed the calls of our fellow citizens in distress and, indeed, to all Americans.

Huawei believes the Commission’s adoption of Long Term Evolution (LTE) as the common technology platform and specifying elements of the LTE standard for inclusion in each deployment will well serve the purpose of facilitating a nationwide interoperable broadband public safety network. Widely supported, the LTE common air interface promises to bring the necessary competition to the applications, network technologies, and devices developed and

¹ See Ex Parte Letter from Patrick Sullivan, Government Relations, Harris Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission (Aug. 1, 2011).

adapted for public safety uses. As expressed in the White House report, released by Vice President Biden on June 16, 2011, which highlights actions being taken by the Obama Administration to facilitate a next-generation wireless public safety network, this decision should “generate significant economies of scale, competition in equipment as well as services, and ongoing innovation of the kind experienced in the modern cellular industry.”² Huawei believes that more competition among vendors will generate a greater degree of innovation, enhanced performance, and economically efficient pricing that will, at the same time, ensure the prudent utilization of public funds.

Huawei is uniquely positioned to deliver high quality, cost-efficient, end-to-end LTE network solutions to public safety operators. The company’s existing commercial LTE solutions span from the network core, to the access network, to multi-mode terminals, to integrated microwave backhaul. In addition, Huawei has been a major contributor to the maturity of the LTE standard through its active participation in several standards organizations and as a leading industry patent holder of LTE-essential patents. Huawei constructed the world’s first commercial LTE network in 2009, and has since constructed an additional 12 commercial LTE networks—50 percent of the global share of commercial LTE networks in operation. Huawei is currently cooperating with operators in more than 100 commercial LTE trials and we have deployed over 130 SingleRAN commercial networks supporting the evolution to LTE.³

Huawei is also working to ensure that the equipment it supplies to customers in the United States, whether private or public network operators, is secure and that network vulnerabilities and threats are identified and resolved quickly. Through a trusted, third-party evaluator, all Huawei source code, hardware and firmware are independently tested and analyzed in a secure environment prior to deployment. With the involvement of both customers and the Federal government, this evaluation process provides stakeholders with visibility into the reliability and security of Huawei products, and affords a solution that incorporates ongoing evaluation as technology upgrades are released. Taken as a given that no network is immune from cyber threats and vulnerabilities, this evaluation process can provide unparalleled assurance of the reliability and security of public safety networks.

Huawei believes that its industry-leading solutions hold the promise of offering public safety network operators some of the industry’s most innovative applications, network technologies and devices at cost-efficient pricing. The company’s ability to collaborate with these operators, however, particularly those jurisdictions that have received a waiver from the FCC for the early deployment of a wireless public safety broadband network, is pending a response from the National Institute of Standards and Technology (NIST) to our expression of interest to participate in the 700 MHz Public Safety Broadband Demonstration Network, jointly administered by the National Telecommunications and Information Administration (NTIA).

² Requests for Waivers of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS-Docket 06-229, *Order*, 25 FCC Rcd 5145, 5158 (2010).

³ See http://www.huawei.com/ilink/en/solutions/expand-broadband/HW_077174. The SingleRAN solution launched by Huawei in 2008 utilizes software defined radio to enable different network modes (i.e., GSM, UMTS, CDMA, and LTE) to be combined into one network.

Huawei first expressed interest in participating in the Demonstration Network by responding to a public notice issued on March 3, 2010, soliciting stakeholder participation in the test Network.⁴ Huawei has repeatedly requested and continues to seek the opportunity to submit our LTE equipment for evaluation by the Federal government and all other public safety stakeholders in this “multi-vendor, neutral host environment.” Our most recent request was made on August 10, 2011, in a meeting with representatives of NIST and the Department of Commerce. As Huawei fully satisfies the evaluation criteria set forth in the notice—“[v]endors who are developing LTE equipment (Band Class 14) are eligible to participate in this project”⁵—we stand ready to submit the 12 LTE units Huawei built and was ready to deliver to NIST and NTIA in October 2010 expressly for the purpose of testing and evaluation as part of the Demonstration Network.

Huawei firmly believes that public safety operators will be well served by applications, network technologies and devices that are fully interoperable and available from multiple vendors. As stated in a recent FCC order on the procurement and sourcing model used by waiver jurisdictions:

“Indeed, one of the most basic tenets of interoperability is the ability of an entity to construct a network using equipment from a variety of vendors that works together seamlessly. In this respect, a network operator should be able to procure cores, radio access network equipment, and devices, all from multiple vendors, without sacrificing functionality.”⁶

Huawei solutions can contribute to these important goals and we remain committed to supporting the nation’s first responders in their service to the American people.

Sincerely,

/s/ Dennis J. Amari
Dennis J. Amari
Director, Regulatory Affairs
Huawei Technologies (USA)

cc: James Arden Barnett, Jr., Chief, Public Safety and Homeland Security Bureau
Jennifer A. Manner, Deputy Bureau Chief, Public Safety and Homeland Security Bureau

⁴ Solicitation of Participation in and Public Meeting to Discuss Public Safety 700 MHz Broadband Demonstration Network, 75 Fed. Reg. 9586 (Mar. 3, 2010).

⁵ *Id.* at 9587.

⁶ Order on the Petition for Clarification filed by Harris Corporation on Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, FCC, PS Docket 06-229, DA 11-1441 (Aug. 22, 2011) .